

**EPA Incorporation of DEQ Technical Comments submitted January 26, 2018**  
**Pre-RD Fish Tissue Field Sampling Plan (FSP) dated January 18, 2018**  
**Portland Harbor Superfund Site**

Comment	How incorporated in EPA comments
<p>1. The AOC SOW (Section 3.2.6) indicates that the fish acoustic tracking study will be used in the Pre-RD Group's analysis to inform the fish tissue sampling plan scheduled for late summer 2018. The Fish Tissue FSP, however, provides a figure and table showing sample locations that are based on locations where previous tissue sampling was successful and does not appear to allow for sample location adjustments based on the tracking results. While collecting samples in locations where previous attempts were successful has merit, and may also be helpful to establish long-term trends, the fish acoustic tracking study may reveal areas where additional fish sampling could improve the value of the data set. DEQ encourages the Pre-RD Group to review the results of the fish tracking study collected in spring and early summer 2018, in coordination with EPA and Partners, to evaluate when modifications are warranted before tissue sampling is initiated in late summer 2018.</p>	<p>EPA understands that data results from the Pre-RD Group sampling program will be shared with EPA throughout the course of the sampling program in the spring and early summer and this will include Fish Tracking results. Accordingly, EPA anticipates using the fish tracking data (pending appropriate implementation and results) to help inform the fish tissue sampling before it is initiated in late summer 2018.</p>
<p>2. DEQ requests that the uncertainties and limitations associated with the fish tracking technology be described in future reports. Please include an evaluation of the potential effects of local and regional smallmouth bass (SMB) fishing tournaments may have on the tracking data. DEQ understands that the SMB fishing tournaments typically involve 5 to 10 boats in local bass club tournaments, and over 20 boats for larger tournaments that are permitted by Oregon Department of Fish and Wildlife and each boat brings in up to 5 fish. The fish are not released at the point of collection; rather tournament rules require release within a mile of the weigh stations. Weigh stations have most often been at the boat ramp at the Swan Island Lagoon, and occasionally at Willamette Park. Common practice for tournaments using Swan Island Lagoon is to release the SMB at the mouth of the lagoon in the main channel. For larger tournaments, fishing may range all the way to Longview, Washington or Bonneville Dam on the Columbia. SMB tracking and tissue data collection efforts should evaluate the potential impacts of the tournaments on the data collected.</p>	<p>This comment is addressed in the EPA Incorporation of DEQ Technical Comments for the Pre-RD Acoustic Fish Tracking Study FSP.</p>